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 Chapter 11 Trustee for South Side House LLC*

UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
SOUTH SIDE HOUSE LLC,	: Case No. 09-43576 (ESS)
	:
Debtor.	:
	:
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**EX PARTE APPLICATION OF JONATHAN L. FLAXER, TRUSTEE, FOR ORDER  
 SHORTENING TIME WITH RESPECT TO MOTION (A) PURSUANT TO 11 U.S.C.  
 § 363(B) OF THE BANKRUPTCY CODE AUTHORIZING CHAPTER 11 TRUSTEE TO ENTER  
 INTO A MANAGEMENT AGREEMENT WITH PRC MANAGEMENT CORP. EFFECTIVE AS  
 OF JANUARY 27, 2014; AND (B) PURSUANT TO § 365(A) OF THE BANKRUPTCY CODE  
 REJECTING ANY MANAGEMENT OR OTHER SIMILAR AGREEMENT  
 WITH SOUTH SIDE ASSOCIATES EFFECTIVE AS OF JANUARY 27, 2014**

TO THE HONORABLE ELIZABETH S. STONG,  
 UNITED STATES BANKRUPTCY JUDGE:

Jonathan L. Flaxer, solely in his capacity as the Chapter 11 Trustee (the “**Trustee**”) for the estate (the “**Estate**”) of South Side House LLC (the “**Debtor**”), by and through his counsel, Golenbock Eiseman Assor Bell & Peskoe LLP (“**GEABP**”), respectfully submits this application (the “**Application**”) for the entry of an order (the “**Order**”), a proposed form of which is annexed hereto as **Exhibit A**, shortening time for notice of hearing on the Trustee’s motion dated January 27, 2014 [Dkt. No. 629] (the “**Motion**”) (a) pursuant to § 363(b) of chapter 11 of title 11 of the United States Code (as amended, the “**Bankruptcy Code**”) authorizing the Trustee to

enter into a management agreement with PRC Management Corp. (“**PRC**”) for management of the property located at 98-116 South Fourth Street, Brooklyn, New York 11249, and (b) pursuant to §365(a) of the Bankruptcy Code rejecting any management agreement that may exist between South Side Associates (“**SSA**”) and the Debtor, in both cases effective as of the date of the Motion.

1. In support of the Application, the Trustee refers the Court to the Declaration of Jonathan L. Flaxer (the “**Flaxer Declaration**”), which was enclosed with the Motion, a copy of which is attached hereto as **Exhibit B** for convenience of the Court, which details the reason the Trustee seeks the requested relief and why he is doing so on an expedited basis. For the reasons stated in the Flaxer Declaration, and in particular paragraph 15 thereof, the Trustee respectfully requests that the Court schedule a hearing on the relief requested in the Motion prior to February 1, 2014, or as soon thereafter as is practicable.

2. The Trustee will provide notice of the Motion to all parties who have requested notice in this case and the parties relevant to the relief sought in the Motion. The Trustee has provided notice of this Application to the Office of the United States Trustee.

3. No previous request for the relief sought herein has been made to this or any other Court.

WHEREFORE, the Trustee respectfully requests that this Court enter an order, substantially in the form annexed hereto as **Exhibit A**, (i) granting the relief requested in this Application, and (ii) granting such other relief as is just.

Dated: New York, New York  
January 28, 2014

Respectfully submitted,

GOLENBOCK EISEMAN ASSOR BELL  
& PESKOE LLP  
437 Madison Avenue  
New York, New York 10022  
(212) 907-7300

By: /s/ Douglas L. Furth  
Douglas L. Furth

*Counsel for Jonathan L. Flaxer,  
Chapter 11 Trustee for South Side House LLC*